

Jason Michael Wejnert
jwejnert@devlinlawfirm.com
Christopher Reed Clayton
cclayton@devlinlawfirm.com
Alex Chan
achan@devlinlawfirm.com
DEVLIN LAW FIRM LLC
1526 Gilpin Ave
Wilmington, DE 19806
302-449-9010

*Attorneys for Plaintiff
Bell Semiconductor, LLC*

Krista S. Schwartz (SBN 303604)
kschwartz@willkie.com
Barrington Dyer (SBN 264762)
bdyer@willkie.com
WILLKIE FARR & GALLAGHER LLP
One Front Street, 34th Floor
San Francisco, CA 94111
Telephone: (415) 858-7400

Akira Irie (CA SBN 258818)
AIrie@mofo.com
A. Max Olson (CA SBN 155510)
aolson@mofo.com
Teresa Truong Pham (CA SBN 345521)
tpham@mofo.com
MORRISON & FOERSTER LLP
Shin-Marunouchi Building, 29th Floor
Chiyoda-ku, Marunouchi 1-5-1 Tokyo, Japan
Telephone: +81 3 3214 6522

Mark L. Whitaker (pro hac vice)
MWhitaker@mofo.com
Morrison & Foerster LLP
2100 L St. NW Suite 900
Washington DC 20037
Telephone: (202) 887-1507
Facsimile: (202) 887-0763
Roman A. Swoopes (CA SBN 274167)
RSwoopes@mofo.com
MORRISON & FOERSTER LLP
755 Page Mill Road Palo Alto, California
Telephone: (650) 813-5600
Attorneys for Defendant Socionext America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

BELL SEMICONDUCTOR, LLC

Plaintiff,

v.

SOCIONEXT AMERICA, INC.

Defendant.

~~C.A. No. 4:23-cv-03116-YGR-TSH~~
~~C.A. No. 4:23-cv-03117-YGR-TSH~~
~~C.A. No. 4:23-cv-03118-YGR-TSH~~

**JOINT STIPULATION OF DISMISSAL
WITH PREJUDICE ; ORDER**

Hon. Yvonne Gonzalez Rogers

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE No. 4:23-cv-03116-YGR-TSH
No. 4:23-cv-03117-YGR-TSH
No. 4:23-cv-03118-YGR-TSH

1 WHEREAS, in the above-captioned actions, Plaintiff Bell Semiconductor, LLC “Bell
2 Semic”) asserted infringement of its U.S. Patent Nos. 7,007,259; 7,149,989; 7,396,760;
3 6,436,807; 7,260,803 and 7,231,626 (“the asserted patents”) by Defendant Socionext America,
4 Inc. (“Socionext” and together, with Bell Semic, “the Parties”) for designing one or more devices
5 using a variety of design tools from one or more of Siemens Industry Software, Inc. (“Siemens”),
6 Cadence Design Systems, Inc. (“Cadence”) or Synopsys, Inc. (“Synopsys”);

7 WHEREAS, Siemens, Cadence, and Synopsys initiated declaratory judgement actions in
8 the District of Delaware involving those same asserted patents referenced above in Case Nos. 22-
9 1569-CFC (“Siemens action”), and 22-1512-CFC (“Cadence/Synopsys action”);

10 WHEREAS, on May 8, 2023, pursuant to a settlement agreement between Bell Semic
11 and Siemens, the court in the Siemens action ordered entry of a stipulation of dismissal, with
12 prejudice, of all claims asserted by declaratory judgement plaintiff Siemens, with each party to
13 bear its own costs, expenses and attorneys’ fees;

14 WHEREAS, on August 1, 2023, pursuant to a settlement agreement between Bell Semic
15 and Cadence, the court in the Cadence/Synopsys action ordered entry of a stipulation of
16 dismissal with prejudice of all claims, counterclaims, and defenses between Bell Semic and
17 Cadence with each party to bear its own costs, expenses and attorneys’ fees;

18 WHEREAS, on December 20, 2023, pursuant to a settlement agreement between Bell
19 Semic and Synopsys, the court in the Cadence/Synopsys action ordered entry of a stipulation of
20 dismissal with prejudice of all claims, counterclaims, and defenses between Bell Semic and
21 Synopsys with each party to bear its own costs, expenses, and attorneys’ fees;

22 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
23 the Parties, through their undersigned counsel, that all claims and defenses of each Party against
24 the other at issue in these litigations are hereby dismissed, with prejudice. Each Party shall bear
25 its own costs, expenses, and attorneys’ fees.
26
27

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

No. 4:23-cv-03116-YGR-TSH
No. 4:23-cv-03117-YGR-TSH
No. 4:23-cv-03118-YGR-TSH

Dated: December 27, 2023

Respectfully submitted,

By: /s/ Akira Irie

Krista S. Schwartz (SBN 303604)
kschwartz@willkie.com
Barrington Dyer (SBN 264762)
bdyer@willkie.com
WILLKIE FARR & GALLAGHER LLP
One Front Street, 34th Floor
San Francisco, CA 94111
Telephone: (415) 858-7400

Akira Irie (CA SBN 258818)
AIrie@mofo.com
A. Max Olson (CA SBN 155510)
aolson@mofo.com
Teresa Truong Pham (CA SBN 345521)
tpham@mofo.com
MORRISON & FOERSTER LLP
Shin-Marunouchi Building, 29th Floor
Chiyoda-ku, Marunouchi 1-5-1 Tokyo, Japan
Telephone: +81 3 3214 6522

Mark L. Whitaker (pro hac vice)
MWhitaker@mofo.com
Morrison & Foerster LLP
2100 L St. NW Suite 900
Washington DC 20037
Telephone: (202) 887-1507
Facsimile: (202) 887-0763
Roman A. Swoopes (CA SBN 274167)
RSwoopes@mofo.com
MORRISON & FOERSTER LLP
755 Page Mill Road Palo Alto, California
Telephone: (650) 813-5600

Attorneys for Defendant Socionext America, Inc.

By: /s/ Alex Chan

Alex Chan
achan@devlinlawfirm.com
Jason Michael Wejnert
jwejnert@devlinlawfirm.com
Christopher Reed Clayton
cclayton@devlinlawfirm.com
DEVLIN LAW FIRM LLC
1526 Gilpin Avenue
Wilmington, DE 19806
Telephone: (302) 449-9010
Facsimile: (302) 353-4251

*Attorneys for Plaintiff
Bell Semiconductor, LLC*

IT IS SO ORDERED this 4th day of January, ~~2023~~2024.


Honorable Yvonne Gonzalez Rogers
United States District Court Judge